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SPECIAL COUNSEL FOR KENT RIES, TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

IN RE: MCCLAIN FEED YARD, INC., MCCLAIN FARMS, INC., AND 7M CATTLE FEEDERS, INC., Debtors. ¹	Chapter 7 CASE NO. 23-20084-rlj Jointly Administered
RABO AGRIFINANCE LLC, <i>Plaintiff,</i> v. ACEY LIVESTOCK, LLC et al., <i>Defendants.</i>	ADV. PROC. NO. 23-02005 Honorable Robert L. Jones

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned hereby appear as additional counsel for Kent Ries, Trustee, (“Trustee”) and requests that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations,

¹ The Debtors in these chapter 7 cases are: McClain Feed Yard, Inc. (Case No. 23-20084-RLJ), McClain Farms, Inc. (Case No. 23-20085-RLJ), and 7M Cattle Feeders, Inc. (Case No. 23-20086-RLJ). All three cases are jointly administered under the case number for McClain Feed Yard, Inc.

orders, disclosure statements and plans of reorganization, or other documents filed or entered in this adversary proceeding be transmitted to:

Kent Ries, Attorney at Law
PO Box 3100
Amarillo, Texas 79116
(806) 242-7437
(806) 242-7440-Fax
Email: kent@kentries.com

And

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PLEASE TAKE FURTHER NOTICE that neither this Request for Notice nor any subsequent appearances, pleadings, claims, proofs of claim, documents, suits, motions nor any other writings or conduct, shall constitute a waiver of Trustee:

- a. right to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court Judge;
- b. right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private right, or in any case, controversy or proceeding related hereto, notwithstanding the designation *vel non* of such matters as “core proceedings” pursuant to 28 U.S.C. § 157(b)(2)(H), and whether or not such jury trial right is pursuant to statute or the United States Constitution;
- c. right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and
- d. other rights, claims, actions, defenses, setoffs, recoupments or other matters to which Trustee is rightly entitled under any agreements or at law or in equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved unto Trustee without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

Dated: April 9, 2024

Respectfully submitted,

QUILLING, SELANDER, LOWNDS,
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By: /s/ Hudson M. Jobe
Hudson M. Jobe
State Bar No. 24041189
Gregory M. Sudbury
State Bar No. 24033367

SPECIAL COUNSEL FOR KENT RIES, TRUSTEE

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing instrument was served upon the counsel and parties of record, electronically through the Bankruptcy Court's Electronic Case Filing System on those parties that have consented to such service on the 9th day of April 2024.

/s/ Hudson M. Jobe